

Synergy Learning
Modern Slavery and Human Trafficking Statement
October 2018

Introduction

This Modern Slavery and Human Trafficking Statement relates to actions and activities during the financial year 1st October 2018 to 30th September 2019.

The statement sets down Synergy Learning's commitment to preventing slavery and human trafficking in our business activities and the steps we have put in place with the aim of ensuring that there is no slavery or human trafficking in our own business and supply chains. We all have a duty to be alert to risks, however small. Staff are expected to report their concerns and management to act upon them.

Organisational structure and supply chains

This statement covers the business activities of Synergy Learning which are as follows:

Delivering learning technology services to a global customer base. Services are mainly delivered from its headquarters in Northern Ireland with additional resource located in Germany and UK

The Company currently operates in the following countries:

UK, Ireland, Germany, Austria, Switzerland.

Training

To ensure a good understanding of the risks of modern slavery and human trafficking in our business and supply chains, the Company requires all staff to complete an online training course during onboarding.

Policies

The Company is committed to ensuring that there is no modern slavery or human trafficking in our business or our supply chains. This Statement affirms its intention to act ethically in our business relationships.

The following policies set down our approach to the identification of modern slavery risks and steps to be taken to prevent slavery and human trafficking in our operations [insert links to the relevant Company policy]:

- 2.1 **Whistleblowing policy** - the Company encourages all its workers, customers and other business partners to report any concerns related to its direct activities or its supply chains.

2.2 Corporate Social Responsibility (CSR) Policy - The Company's CSR policy summarises how we manage our environmental impacts and] how we work responsibly with suppliers and local communities.

Due Diligence Processes for Slavery and Human Trafficking

The Company undertakes due diligence when considering taking on new suppliers, and regularly reviews its existing suppliers. The Company's due diligence process includes building long-standing relationships with suppliers and making clear our expectations of business partners and evaluating the modern slavery and human trafficking risks of each new supplier and invoking sanctions against suppliers that fail to improve their performance in line with an action plan provided by us, including the termination of the business relationship.

Performance indicators

The Company uses the following key performance indicators (KPIs) to measure how effective we are in ensuring slavery and human trafficking is not taking place in any part of our business or supply chains including requiring all staff to have completed training on modern slavery.

This Modern Slavery and Human Trafficking Statement will be regularly reviewed and updated as necessary. Synergy Learning's Board of Directors endorses this policy statement and is fully committed to its implementation.

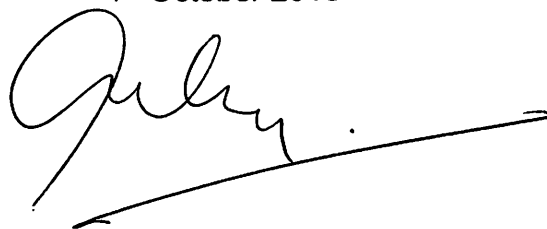
This Modern Slavery and Human Trafficking Statement has been approved and authorised by:

Name: Roy Kerley

Position: CEO

Date: 1st October 2018

Signature:

A handwritten signature in black ink, appearing to read 'Roy Kerley', with a long horizontal line extending to the right.